

SAMHSA Supplemental Security Income/Social Security Disability Insurance Outreach, Access and Recovery Training Center (SOAR) Web-based Data Form

Supporting Statement

A. Justification

The Substance Abuse and Mental Health Services Administration (SAMHSA) is requesting approval from the Office of Management and Budget for an extension of the Supplemental Security Income/Social Security Disability Insurance Outreach, Access and Recovery Training Center (SOAR) Web-based Data Form. This form, originally approved under OMB No. 0930-0329, expires May 31, 2020, is designed for SOAR-trained caseworkers to log and track outcomes on applications submitted for the Social Security Administration's (SSA) disability benefit programs, SSI and SSDI. The form has two parts, Part I collects information on the outcomes of SSI/SSDI applications submitted using the SOAR model. Part II collects information on systems level implementation of the SOAR model from state leads on an annual basis in two sections. Section 1 collects information on summary level outcomes from state leads that do not use Part I of the form (12 state leads), and Section 2 collects qualitative information from all state leads (51 state leads).

A. 1. Circumstances of Information Collection

In 2009, SAMHSA created a Technical Assistance (TA) Center to assist in the implementation of the SOAR effort in all states. SOAR's primary objective is to improve the allowance rate for SSA disability benefits for people who are experiencing or at-risk of homelessness, and who have serious mental illness, co-occurring substance use disorders, or other physical disabilities. SOAR grew out of the Federal Policy Academy initiatives on chronic and family homelessness, where plans from most states identified a need to better access mainstream benefits to alleviate homelessness. Two primary benefits identified for this population are the SSA disability benefits, SSI and SSDI. The recent literature states that receipt of SSI or SSDI was associated with a lower likelihood of returning to emergency shelters.

In response to requests from communities and states implementing SOAR, the SOAR TA Center under SAMHSA's direction developed a web-based data form that caseworkers can use to track the progress of submitted applications, including decisions received from the SSA either on initial application or on appeal. Not all caseworkers use the SOAR Web-based Data Form, so the data collected using the form is a sampling of caseworkers tracking outcomes of their SOAR-assisted applications. SAMHSA estimates that the reporting on the SOAR Web-Based Data Form represents a sample of about 65 percent of cases on which SOAR is used.

State and Local Leads spearhead and coordinate the implementation of SOAR initiatives. These leaders identify and engage stakeholders to participate in steering committees whose goal is to create and implement a SOAR action plan and process for SSI/SSDI application submission. These committees meet regularly to collaborate, report on progress, and troubleshoot challenges. Section 501(d)(4) of the Public Health Service Act (42 USC 290aa) and Public Law 106-107 are the authorizing legislation for the SOAR Web-based Data Form.

A. 2. Purpose and Use of Information

Since 2006, the SAMHSA SOAR TA Center has collected data on application outcomes from states that have initiated SOAR and have tracked these data. Early on, one of the SAMHSA SOAR TA Center's tasks was to simplify the tracking of application progress and decisions. To that end, the data form and SOAR Online Application Tracking (OAT) system was developed and is now housed on a secure server and available online at <https://soartrack.prainc.com>. The SOAR OAT is an outcome collection database designed to ease data-entry, provide comprehensive and useful reporting, and allow for multiple user types to meet the needs of the national SOAR community. This easily accessible and user-friendly system allows SOAR-trained workers to view how well their SOAR projects and caseworkers are performing by visualizing data on SSI/SSDI application submissions, rates of approvals, and rates of denials in real-time. In turn, they can use this up-to-the-minute performance data to provide targeted technical assistance to SOAR projects and specialists in need of improvement. The OAT system keeps track of SOAR-assisted SSI/SSDI applications, records decisions on applications, including appeals, summarizes outcomes in reports that can be used for sustainability efforts, contains no personally identifiable information, and takes 5 minutes or less to enter data on each application.

SOAR providers track outcomes in OAT to help expand their SOAR initiatives, help persuade potential partners to join their SOAR effort by showing their achievements, monitor case workers' approval rates and use of SOAR critical components to better target technical assistance and refresher training, and sustain local, state, and federal SOAR efforts. The advantages for case workers include being able to track their SOAR applications online anytime and have all of their application outcomes in one place. Agency leads and supervisors are able to track performance by individuals or all case workers and they have easy access to reports for quality review purposes. State and local leads are able to access reports on application outcomes anytime and can prepare agency reports by date, or generate separate reports for initial applications and appeals.

As stated above, the web-based data collection form continues to assist caseworkers in tracking outcomes of disability applications. There is a paper version of the data form available as a reference or worksheet, but all data is collected through the web-based version.

Reports generated from the data collected assist agency directors to monitor the allowance rates of individual caseworkers and to provide technical assistance and additional training as needed. On the state and national levels, these reports are also used to quantify the success of SOAR overall, measure the implementation of core SOAR components, and identify areas where additional technical assistance is needed. There is a strong emphasis on tracking the outcomes of SSI and SSDI applications using the SOAR process as the number of communities using SOAR increases. Communities also use the outcomes of applications to conduct quality review assessments of caseworkers to ensure the effectiveness of their programs. More importantly, many communities use their strong outcomes to justify additional funding to support their SOAR implementation efforts.

In addition, data from the form can be compiled into reports on the outcome of and time to decision of SSI and SSDI applications and the use of SOAR critical components, such as the SSA-1696 Appointment of Representative, which allows SSA to communicate directly with the

caseworker assisting with the application. These reports are used by agency directors, SOAR State Team Leads, and the SAMHSA SOAR TA Center to quantify the success of the effort overall and to identify areas where additional technical assistance is needed. Other federal agencies, such as the United States Interagency Council on Homelessness (USICH) and the Department of Veterans Affairs, use outcomes of the SOAR initiative, specifically total numbers of decisions and approvals of SSA disability benefit applications submitted using SOAR. A link to this annual outcome brief is posted on the SOAR website.

SOAR Data Form Part I

Part I of the SOAR Web-based Data Form is intended for SOAR-trained case workers to enter the outcomes of SOAR-assisted SSI/SSDI applications. For this part of the form, there is an annual average of 700 respondents, with an average of 3 responses per respondent per year.

Kinds of Information to Be Collected

Recognizing that the SOAR method can be used for initial applications, reconsiderations, Administrative Law Judge (ALJ) hearings, and for non-SOAR applications, the SOAR Web-based Data Form (Part I) includes four distinct sections. (See below for a description of each section and Attachment A for the questions included in the form.) In addition to dates of application submission and decision, data elements include some of the more critical components of the SOAR process, including the submission of the SSA-1696 Appointment of Representative form, the collection of medical records by the caseworker, and the submission of a Medical Summary Report. These data elements are included in all sections of the report. No personal identifying information, such as name, Social Security Number or date of birth is collected using the form. Instead, case workers assign a unique identifier to each case they enter. All data generated in the reports are either in the aggregate or averages.

Demographics

The demographic information on each applicant is collected in this section. Basic information including gender, age, military service, benefits received, employment status, and housing status are included.

Initial SOAR Application

This section records the protective filing date, (when SSA was first notified of an intent to file an application for disability benefits), when the application was submitted, whether a quality review of the application was completed, and whether a Consultative Exam was ordered. Other data include the date and result of SSA's decision and whether a representative payee was needed and provided.

SOAR – Initiated Reconsideration

For applications initiated at the reconsideration level, data elements include whether SOAR staff initiated the reconsideration, whether the basic SOAR critical components were used, and whether a representative payee was needed and provided.

SOAR – Initiated ALJ Hearing

For applications initiated at the ALJ hearing level, data elements include whether SOAR staff initiated the appeal, whether an expedited hearing or review on record was requested, whether

the applicant had an attorney, the date and outcome of the hearing, and whether a representative payee was needed and provided.

Non-SOAR Applications

For those applications where the SOAR process was not used, data elements include the date of first contact with the applicant, where the application was in the process, what decisions had been received, and whether a representative payee was needed and provided.

SOAR Data Web-based Form Part II

Part II of the SOAR Web-based Data Form includes two sections reserved for SOAR State Team Leads to report annually.

1. Part II, Section 1: The first section of Part II collects quantitative summary data from states that do not track SOAR-assisted SSI/SSDI applications using the SOAR Web-based Data Form Part I.

2. Part II, Section 2: The second section of Part II collects qualitative (open-ended) questions on annual SOAR accomplishments, identified challenges, and collaborations. The questions ask about new initiatives, challenges, funding sources, steering committees, and training. There are open-ended questions on collaborations with specialty areas (e.g. Veterans, justice-involved persons, hospitals) that could require a response. There are a maximum of 75 respondents for this section of the form once per year.

A. 3. Use of Information Technology

SAMHSA chose an electronic, web-based data form to facilitate access to this data collection and case management tool. This password-protected web-based data form is housed on the SOAR website (<https://soartrack.prainc.com>). Reports are generated and submitted electronically as part of the SSI/SSDI application process. No personal identifiers will be included in any report generated by this application, and it is in complete compliance with Section 508 of the Rehabilitation Act.

A. 4. Efforts to Identify Duplication

The information is collected only for the purposes of the SOAR effort and is not available elsewhere.

A. 5. Involvement of Small Entities

This data collection does not have significant involvement of small entities.

A. 6. Consequences If Information Collected Less Frequently

The use of this data form is completely voluntary. The SAMHSA SOAR TA Center requests aggregate data from each state annually, but neither states nor individual programs implementing SOAR are required to use this form. They can choose other methods of data collection and management for SSA disability applications. If data are not collected, however, SAMHSA will be unable to make informed decisions about future funding for SOAR and how best to direct resources for technical assistance.

A. 7. Consistency With the Guidelines in 5 CFR 1320.5(d)(2)

This information collection fully complies with 5 CFR 1320.5(d)(2).

A. 8. Consultation Outside the Agency

The notice required in 5 CFR 1320.8(d) was published in the *Federal Register* on December 6, 2019 (84 FR 66923). No comments were received.

Nine representatives from five states were asked to review the prototype of the web-based data form for usability and navigation for the initial OMB approval submission.

A. 9. Payment to Respondents

Respondents will not receive any payment.

A. 10. Assurance of Confidentiality

No personal identifying information is being collected and the form is password protected. Client-level application data will be stored on a secured (https) part of the Policy Research Associates, Inc. (the TA Center’s contractor) server. Reports are available in aggregate and summary online and can also be submitted to agency and SOAR leads via email as an Excel spreadsheet. There are no identifiers in the data. The contractor’s Human Subjects Coordinator and Institutional Review Board chair met and concluded that this project meets the criteria for exemption from IRB review (45 CFR 46.1010(b)(5)(i)). A Certificate of Confidentiality is not required. Data will be kept private to the extent of the law.

A. 11. Questions of a Sensitive Nature

This information collection contains no questions of a sensitive nature.

A. 12. Estimates of Annualized Hour Burden

The annualized hour burden is summarized in the table below:

Form Name	No. of Respondents	Responses per Respondent	Total Responses	Hours per Response	Total Hour Burden	Hourly Wage Cost	Total Hour Cost (\$)
SOAR Data Form (Part I)	700	3	2,100	.25	525	\$20	\$10,500
Annual Report Questions (Part II)	75	1	75	1	37.50	\$20	\$750
TOTAL	775		2,175		562.50		\$11,250

The hour burden estimate was calculated, including the number of responses and hours per response, based on a review of usage in calendar year 2018. The hourly wage cost was calculated using Bureau of Labor Statistics (BLS) median salary for mental health and substance use social workers (<http://www.bls.gov/oes/current/oes211023.htm>) in May 2018. Their estimated yearly salary is \$49,630. Since data will be entered primarily by caseworkers, SAMHSA felt this category was the closest in the BLS data. The hourly wage for that salary is approximately \$20.

It is also anticipated that caseworkers may enter data on an application more than one time (for Part I of the form), so the time they will be in the form may vary. For example, they may enter the demographic data and the protective filing date and then enter the form again to enter the date the application was submitted. Not all states use the SOAR Web-based Data Form, so the data collected using the form is a sampling of caseworkers tracking outcomes of their SOAR-assisted applications.

The Annual Report Questions (Part II) are only asked once per year and only by a small number of specific users, as indicated in the table above.

A. 13. Estimates of Annualized Cost to Respondents

There is no capital/startup or operation and maintenance cost involved in collecting the information. Use of this web-based form is voluntary. If caseworkers do not have internet access, they can use a variety of other methods of data tracking, such as the Homeless Management Information System (HMIS) if it has been customized to include SOAR data elements, an Excel spreadsheet or paper forms (see B.2). Not all states use the SOAR Web-based Data Form, so the data collected using the form is a sampling of caseworkers tracking outcomes of their SOAR-assisted applications.

A. 14. Estimates of Annualized Cost to the Government

If funding is continued the cost would be estimated at approximately \$50,000 annually, which would cover implementation and analysis by the contractor for the TA Center and 2 percent of a SAMHSA project officer's time at \$100,000 annual salary (\$2,000) for each year of the contract. The annualized cost to the government is \$52,000 per year.

A. 15. Time Schedule, Publication and Analysis Plans

It is anticipated that once OMB clearance has been approved on the renewal and revision of this form, data collection will continue for as long as case workers track applications they submit using the SOAR model. Outcome data on SOAR applications will be compiled and published annually by the SOAR TA Center under SAMHSA's guidance from reports generated from the web-based data form. In addition, reports will be shared with the USICH and VA to fulfill their data requests. The SAMHSA SOAR TA Center will seek renewal of OMB clearance every three years or when any modification is made to the form.

A. 16. Display of Expiration Date

The expiration date will be displayed on the website and the form.

A. 17. Exceptions to Certification Statement

This submission describing data collection requests no exceptions to the Certificate for Paperwork Reduction Act.